



The Kraft Heinz Company Employee Code of Conduct

Guiding Principles

Compliance with all applicable laws, regulations and Company policies

The Company is subject to federal, national, state, provincial, local, and international laws and regulations. We all must comply with all applicable laws and regulations.

Adherence to Highest Ethical Standards

Each of us must adhere to the highest ethical standards of conduct in all of our business activities and must act in a manner that enhances the Company's reputation in the business community and with the public. Integrity is, and must continue to be, the basis of all our business relationships.

Duty to Speak Up/No Retaliation

We all have a right to report violations of the law, this Code, or other Company policies; but more importantly, we also have a duty to promptly report suspected violations.

No retaliation of any kind will be taken against an employee who reports suspected violations in good faith. The Company will take steps to protect each employee from retaliation so that all are comfortable reporting violations and protecting the Company.

Rules

Our People

We Prioritize Safety in Our Workplace

Wherever we are, safety must always come first. We are committed to providing a safe and healthy workplace for all of our employees. As part of this commitment, all facilities must comply with workplace safety laws. Employees are expected to perform their duties in a safe manner at all times, including wearing the appropriate gear, operating machinery only according to instructions, and taking appropriate action when a safety hazard arises.

Do What's Right!

- ✓ Follow the safety guidelines in place at each of our locations. You are accountable for maintaining an environment free of safety risks or health hazards. When a risk or an unexpected danger emerges, act quickly and safely to get it under control and seek help right away.
- ✓ Do not come to work under the influence of drugs or alcohol. Remember: any substance that could impair our judgment or physical performance can ultimately harm our co-workers and our consumers.
- ✓ Maintain a safe workplace by resolving differences professionally and respectfully, never through acts or threats of violence, bullying or intimidation.



We Handle Non-Public Information Privately and Confidentially

Employees must maintain the confidentiality of non-public information entrusted to them by the Company, customers and suppliers, except when disclosure is authorized or legally mandated. Employees must protect confidential and proprietary information entrusted to them by the Company, customers and suppliers, except when disclosure is authorized or legally mandated.

Those who use or have access to such information, including co-workers' personal information are responsible for keeping it safe and using it only for legitimate and appropriate reasons.

Do What's Right!

- ✓ Only access, use, store, transfer or modify non-public information as needed to do your job.
- ✓ Never share non-public information with someone who doesn't have a business need to know it and isn't authorized to have it.
- ✓ Prevent accidental disclosure by keeping your devices password-protected and safely securing any sensitive files in a locked drawer or cabinet.



We Do Not Tolerate Discrimination or Harassment



We believe diversity in our workforce is an asset that enhances our creativity, innovation, and growth. Our employees' different cultures, sexual orientations, gender identity, backgrounds and experiences allow issues to be seen from varied perspectives, thereby enriching the decision-making process. All personnel decisions, including, but not limited to, those relating to recruitment, hiring, training, promotion, compensation and benefits, will be based solely upon an employee's or applicant's qualifications, skills, performance, and abilities and without regard to any condition or characteristic protected by applicable law. We value meritocracy!



The Company will not tolerate harassment— whether it is sexual or non-sexual in nature – of its employees by anyone, including any supervisor, co-worker, employee or non-employee, vendor, client, or customer of the Company.

Do What's Right!

- ✓ Afford equal employment opportunities to qualified employees and applicants in conformity with all applicable laws and regulations.
- ✓ Keep interactions with your fellow employees professional and respectful. Do not create an uncomfortable, hostile, or intimidating environment for others through your actions or words.

- ✓ Respect the diverse characteristics we each bring to the table, even when our cultures or ideas may differ.

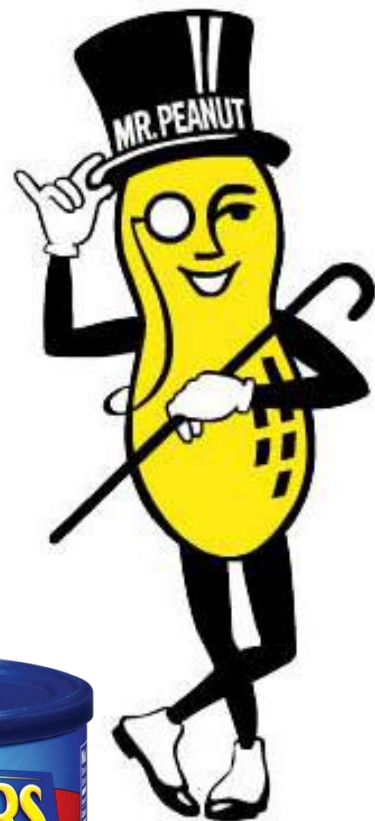
Our Customers and Consumers

We Make Delicious, Safe and High Quality Food

Our primary goal is to provide delicious, safe, nutritious, and wholesome foods. We strive to consistently deliver products that meet consumers' expectations and our own high standards and seek continuous improvement and innovation in our operations to meet those standards. We are committed to providing the nutritional benefits and food value promised in our products' labeling and advertising.

Do What's Right!

- ✓ Comply with all applicable food and consumer product safety laws in every jurisdiction in which we do business.
- ✓ Follow all food health and safety protocols in your workplace (including product recall procedures) and respond quickly when issues arise to ensure that every product that reaches our consumers is of the highest quality.
- ✓ Make food safety a personal responsibility: come forward with concerns of potential health or safety hazards immediately. We act and think like owners: ownership is one of our most important values.



We Market and Communicate Responsibly

The Company's public communications – like our products – reflect our commitment to integrity and transparency.

We market, advertise, and label our foods with this in mind, striving for accuracy, transparency and openness with our consumers. We never try to mislead our consumers with incorrect or incomplete information about our own products or anyone else's.

Likewise, we give our investors a reliable look into our day-to-day operations through routine public communications and unwavering transparency.

To maintain accuracy and consistency in all these public communications, only designated Company spokespersons should make public statements about our Company.



Do What's Right!

- ✓ Follow all marketing and advertising laws, ensuring that our claims are substantiated and our methods are both ethical and legal.
- ✓ Market our foods in a truthful, accurate way, never through deception or exaggeration.
- ✓ Pay special attention to the ways in which our products are advertised to younger audiences; honesty is the key in creating realistic expectations around a child's health and nutrition.
- ✓ When using social media do not discuss any confidential Company information and avoid expressing opinions that could be attributed to the Company; only authorized spokespersons should use social media to make statements on our Company's behalf.
- ✓ Refer media requests for information or comments to the Communications team; refer analyst requests for information to the Investor Relations team.

Our Company and Shareholders

We Maintain the Integrity, Accuracy and Reliability of Our Books, Records and Controls

We are committed to maintaining the Company's financial books and business records with the highest degree of accuracy, completeness and integrity. We rely on our financial books and business records to make smart, timely business decisions. We also recognize that our investors rely on our books and records to get an accurate picture of the Company's condition.

All employees generate records as part of their regular tasks, like filling expense reports, drafting contracts and proposals or sending e-mails. It's crucial that these documents accurately reflect the situation, and that no information is left out. Even the smallest misrepresentation will damage the Company's reputation and shake the trust of our investors.

Do What's Right!

- ✓ Provide the Company's Directors, employees, consultants, and advisors involved in the preparation of the Company's required disclosures with information that is accurate, complete, objective, relevant, timely, and understandable.
- ✓ Record all financial information and business transactions completely, accurately and in a timely manner, and comply with the Company's disclosure controls and procedures
- ✓ Be professional, thoughtful and accurate when creating records, including email or instant messages.
- ✓ Maintain and destroy records according to our records management policies, applicable legal holds, and record retention schedule.



We Protect and Ensure Proper Use of Company's Assets

All employees are responsible for the proper use of Company assets. The Company has three types of assets: (1) **physical assets**, such as materials, supplies, software, inventory, equipment, computers, internet access and technologies; (2) **information assets**, such as confidential and proprietary business information and intellectual property (including our valuable brands); and (3) **resource assets**, such as capital and company time during the work day.

Employees must take all reasonable steps to protect Company assets from theft, destruction, or other loss and to ensure that assets are not wasted, misused, or diverted.



Do What's Right!

- ✓ Protect all Company assets in your care from loss, theft, damage, waste, or misuse.
- ✓ Use Company assets for their intended business purposes. While some personal use may be allowed, such use must always be legal, ethical, reasonable and should not interfere with your job.
- ✓ Take precautions to avoid losing, misplacing, or leaving confidential information (or laptops, smartphones, or other items containing this information) unattended.
- ✓ Avoid discussing confidential information or any other sensitive topics in public areas (think planes, elevators, and restaurants) where others might overhear you.
- ✓ Don't use Company technologies to download, view, or send materials that are obscene, offensive, discriminatory, harassing or otherwise unlawful or unethical.

We Do Not Use or Disclose Inside Information for Personal Gain

As employees, we have access to Company information before it reaches the public. By protecting this “inside information,” and not misusing it, we act in the Company’s and our investors’ best interests.

Inside information is information that is both material and non-public in nature. Material information is information that could affect a person’s decision whether to buy, sell or hold securities. This sort of information is considered non-public until it has been made public (for example, through public filing with a securities regulatory authority; issuance of a press release; or disclosure of the information in a national or broadly disseminated news service).



Regardless of how we come across inside information, we cannot use it for personal gain nor disclose it to others unless authorized by the Company. Employees who use inside information for personal gain may violate federal insider trading laws, which can lead to imprisonment, fines and damage to the Company’s reputation.

This rule also applies to inside information relating to other companies, including Company’s vendors and suppliers when that information is obtained in the course of employment with, or the performance of service on behalf of the Company.

Do What’s Right!

- ✓ Never buy or sell Company securities (or securities of any publicly traded company) when you possess inside information or during trading blackout periods.
- ✓ Before buying or selling Company securities, ensure that you are not subject to a trading blackout or any other trade restrictions. If you are unsure, contact the Legal Department.



The Kraft Heinz Company Employee Code of Conduct

- ✓ Don't disclose inside information to anyone outside the Company (including family members or friends) for any reason. If that person uses this information to trade in the stock market, you are legally responsible for "tipping" that person.

We Don't Take Actions that Conflict or Appear to Conflict with Company's Best Interests

We must avoid any circumstances that create or appear to create an improper personal benefit through the use of Company property, information, or position. Our business decisions must always be based on objective criteria of what's best for the Company. Even the appearance of a conflict of interest could result in serious consequences, and can undermine the trust that employees, business partners and the public place in the Company.

Employees must disclose any actual or potential conflict involving personal and family relationships (spouse, parents, children, brothers and sisters, and relatives by marriage), outside employment and board memberships, financial interests and investments, and corporate opportunities as early as possible, so that any conflict of interest may be addressed and resolved in an appropriate manner.



Do What's Right!

- ✓ Employees should not engage in any activity that conflicts with the Company's business, such as working in any capacity for another food and beverage company. Employees should not use Company time, resources, or relationships to do work for another company.



The Kraft Heinz Company Employee Code of Conduct

- ✓ If a family member or close friend owns or works for a company seeking to do business with the Company, talk to your manager about your relationship. Similarly, remove yourself from the selection process when your family member interviews for a position at the Company. Do not supervise or be supervised by a family member.
- ✓ Employees should avoid having a financial interest in any company or entity that is (or seeks to be) a business partner, supplier or customer or competitor without first seeking approval.



We Do Not Accept Gifts as Company Employees

Exchanging gifts, entertainment and other forms of hospitality is a common way to build business relationships. However, misuse of gifts and entertainment can lead to actual or apparent conflicts of interest and increase the risk of serious bribery and corruption issues. To prevent these problems, we maintain appropriate restrictions on the giving and receiving of gifts and entertainment

We are prohibited from accepting or receiving gifts of value from any business partner. However, items that are insignificant, small, incidental, and have no market value, such as logoed promotional items (e.g., pens or paper provided at meetings; product samples; publications; etc.) are reasonably permitted. We are also strictly prohibited from soliciting gifts or services for themselves or others, including family members, or friends.

Consistent with our practice of not accepting gifts, employees are generally prohibited from giving gifts of any value to a business partner. Exceptions must be approved in advance by a responsible manager and local legal department. The gift given also should be in compliance with gifts policies established by the receiving party. For your own



The Kraft Heinz Company Employee Code of Conduct

protection and the Company's, always register and record any such cases using the appropriate forms or resources; transparency is always the best behavior.

Business Entertainment is a situation where representatives from both companies (recipient and provider) attend a meal, performance, or other event and is not considered to be a prohibited gift provided that it complies with the provider's and recipient's policies. Always be careful and remove yourself from instances where the Company's reputation might be even slightly harmed.

Do What's Right!

- ✓ Do not offer or participate in Business Entertainment that is excessive, lavish or extravagant or at a location and conducted in a manner that could harm the Company's reputation.
- ✓ Do not receive or give gifts or Business Entertainment that creates the appearance of conflict of interest or that seeks to influence a decision.
- ✓ Do not give gifts that are cash or cash equivalents, like gift cards.



Our Business Partners and Communities

We Do Not Tolerate Bribery and Corruption

We have a zero tolerance anti-corruption policy and employees must never offer, give or accept bribes to get business done. We are strictly prohibited from directly or indirectly giving, offering, promising, or authorizing anything of value – no matter how small – to any government official or agency (including a national or local government official or employee, a political candidate, or an official or employee of a government-owned or controlled entity) or any other individual to corruptly secure a business advantage, influence business or governmental decision making in connection with any of our activities, or otherwise induce the recipient to abuse his or her power or official position.



This prohibition must be interpreted broadly and applies to anyone acting on our behalf, including suppliers, distributors, contractors, consultants and agents.

We strictly abide by the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and all similar statutes applicable in each jurisdiction.

In many countries, facilitating payments offered in exchange for expedited services are legal. Nonetheless, such payments often appear unethical and we do not permit them. We are a global company and our reputation matters.

In certain parts of the world local custom and business practices may permit providing gifts or entertainment to government officials. In such cases, employees must obtain pre-approval before providing the government official with any gift or any item of value or provision of any entertainment or hospitality.



The Kraft Heinz Company Employee Code of Conduct

Do What's Right!

- ✓ Never offer, promise, or provide anything of value (no matter how small) to a government official or other third party in order to gain a business advantage.
- ✓ Do not instruct, authorize, or allow a third party to make a prohibited payment on your or the Company's behalf.
- ✓ Do not make a payment to a third party knowing or having reason to believe that it is likely to be used to improperly provide something of value to a government official or other individual.
- ✓ Always record any payments made or receipts obtained accurately, completely, and in a timely manner.



We Comply With Competition and Antitrust Laws

Antitrust laws (also referred to as “competition laws”) govern competitive conduct, and apply to the Company's relationships with other manufacturers, competitors, suppliers, brokers, and customers. The laws are often very broad and complex, and vary from country to country, but they share the same goal: to encourage free and fair competition. The Company's antitrust policies provide employees overall guiding principles that, if followed, will help ensure compliance with antitrust laws across all jurisdictions in which we conduct business.

Penalties for violating antitrust laws are severe, and include significant fines and other monetary liability. In addition, employees who authorize or participate in violations can face imprisonment in many nations. Ignorance of what constitutes a violation of these laws is no defense.



The Kraft Heinz Company Employee Code of Conduct

By competing with integrity throughout the world, we can avoid running afoul of competition laws while protecting one of our most valuable assets: our reputation.

Because circumstantial evidence is frequently the basis upon which antitrust liability is found, avoid even the appearance of anti-competitive conduct.



Do What's Right!

- ✓ Follow all applicable antitrust and competition laws. Consult the Law Department immediately whenever you have an antitrust or competition law question, or if you feel you may have been part of an anti-competitive conversation or interaction.
- ✓ Do not enter into any agreement or understanding with any competitor regarding price.
- ✓ Do not discuss with any competitor our Company's or such competitor's past, present, or future prices, markets promotional programs or sale terms.

We Are a Socially and Environmentally Responsible Company: We Actively Engage In Growing a Better World

We are dedicated to enhancing the quality of people's lives through our commitment to sustainability, health and wellness, and social responsibility.

We comply with all applicable environmental laws and regulations. We are vigilant in preventing accidents, spills, and any other potential threats to the health and safety of our communities and our planet.



The Kraft Heinz Company Employee Code of Conduct

We place a high value on an ethical and transparent supply chain. Accordingly, we demand that all business partners demonstrate a clear commitment to protecting the rights of workers worldwide. We do not tolerate the use of forced labor—including human trafficking and slavery.

Do What's Right!

- ✓ Make sustainability a personal goal: conserve electricity, recycle resources, and be conscious of your individual impact on the environment.
- ✓ Report any environmental health and safety hazards right away; spills, leaks, and other potentially dangerous situations can't wait.
- ✓ Ensure suppliers and other business partners are committed to following environmental regulations and human rights laws.
- ✓ Actively participate in our programs and initiatives to improve the world and communities.



Waivers

While all of us are expected to uphold our Code at all times, the Company understands that, in rare circumstances, a waiver of the Code might be necessary. Such waivers are granted on a case-by-case basis, and are only appropriate when strict adherence to the Code could cause significant hardship.

Any waiver or amendment of this Code for the Chief Executive Officer, General Counsel, Chief Financial Officer, Global Controller, other senior financial or executive officers or directors must be approved by the Board of Directors. For all other employees, any waiver of this Code must be approved by the General Counsel.